

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMARR KELLAM,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO.
	:	2:10-cv-01644-JCJ
v.	:	
	:	
INDEPENDENCE CHARTER SCHOOL,	:	
	:	
	:	
Defendant.	:	
	:	

**DEFENDANT’S, INDEPENDENCE CHARTER SCHOOL,
MOTION TO DISMISS COMPLAINT**

Defendant, Independence Charter School, by and through its undersigned counsel, respectfully moves to dismiss the Complaint filed by Plaintiff Jamarr Kellam, for the reasons set forth in the attached Memorandum. Independence Charter School asks the Court to dismiss Plaintiff’s Complaint and all claims brought against Independence Charter School with prejudice.

Respectfully submitted,

Segal McCambridge Singer & Mahoney, Ltd.

Dated: July 16, 2010

By: /s/ Brian W. Franklin
Walter H. Swayze, III, Esquire
PA 59101
Brian W. Franklin, Esquire
PA 202523
Suite 1700, United Plaza
1818 Market Street, Suite 2600
Philadelphia, PA 19103
Phone: (215) 972-8015
Telefacsimile: (215) 972-8016
Attorneys for Defendant,
Independence Charter School

CERTIFICATE OF SERVICE

I, Brian W. Franklin, Esquire, hereby certify that I electronically filed the foregoing *Motion to Dismiss Complaint* and supporting memorandum with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to the below listed individual(s). The document so filed is available for viewing and downloading on the ECF System.

May Mon Post, Esquire
The Post Law Firm
1735 Market Street, Suite A-194
Philadelphia, PA 19103-7502
Attorney for Plaintiff

Segal McCambridge Singer & Mahoney, Ltd.

By: /s Brian W. Franklin
Brian W. Franklin, Esquire

Date: July 16, 2010